

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

HILARY REMIJAS, MELISSA FRANK,
DEBBIE FARNOUSH, and JOANNE KAO,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

THE NEIMAN MARCUS GROUP, LLC, a
Delaware limited liability company,

Defendant.

Case No. 1:14-cv-01735

Hon. Samuel Der-Yeghiayan

**AGREED MOTION SEEKING PERMISSION TO EXCEED PAGE LIMITATION IN
MEMORANDUM IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL
OF CLASS ACTION SETTLEMENT**

Plaintiffs Hilary Remijas, Melissa Frank, Debbie Farnoush, and Joanne Kao ("Plaintiffs"), by and through their attorneys, respectfully move for an extension of the fifteen-page limit applicable to their Memorandum in Support of Plaintiffs' Motion for Final Approval of Class Action Settlement ("Memorandum"). In support of this motion, Plaintiffs state as follows:

1. Plaintiffs respectfully submit that in order to properly explain to the Court the details of the proposed class-wide Settlement, and present the adequacy of the class notice program, and present the merits of certifying the class for settlement purposes, twenty-four (24) pages are required. Plaintiffs believe that in a Memorandum of this complexity and consequence to the proposed class, exceeding the fifteen-page limitation will benefit the Court's consideration

of the substantial rights and remedies that Plaintiffs' Motion seeks on behalf of the proposed class. Plaintiffs submit that in these circumstances, it is fair and consistent with the interests of justice to allow for a brief of this length in support of a Motion for Final Approval of Class Action Settlement. There is no prejudice to Defendant Neiman Marcus, and Daniel Craig, counsel for Defendant, represented to Robert Ahdoot, counsel for Plaintiffs, that Defendant does not oppose this motion.

2. In light of the foregoing, Plaintiffs respectfully request that they be granted leave to file a twenty-four-page Memorandum in support of their Motion for Final Approval of Class Action Settlement.

WHEREFOR, Plaintiffs respectfully request that this Court enter an order permitting them to file a twenty-four-page Memorandum in support of their Motion for Final Approval of Class Action Settlement.

Dated: August 21, 2017

Respectfully submitted,

/s/ Tina Wolfson

Tina Wolfson

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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that the foregoing Agreed Motion Seeking Permission to Exceed Page Limitation in Memorandum In Support of Plaintiffs' Motion for Final Approval of Class Action Settlement was filed electronically with the Clerk of the Court using the CM/ECF system on this 21st day of August, 2017, and served electronically on all counsel of record.

/s/ Tina Wolfson
Tina Wolfson